

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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KEVIN CAMPBELL,

Plaintiff,

DECLARATION OF  
GABRIEL P. MCGAHA

-against-

FEDERAL EXPRESS CORPORATION a/k/a  
FEDEX EXPRESS, and ERIC WARNDERS,  
INDIVIDUALLY,

Civil Action No. 22-cv-7662

Defendants.  
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I, Gabriel P. McGaha, attorney for Defendants Federal Express Corporation and Eric Warnders, declare under penalty of perjury that the foregoing is true and correct. I am an attorney admitted to practice law in this Court and submit this Declaration to identify the exhibits submitted with Defendants' Motion for Summary Judgment.

1. Attached hereto as **Exhibit A** is Sharon Daniel's Declaration.
2. Attached hereto as **Exhibit B** is Eric Warnders' Declaration.
3. Attached hereto as **Exhibit C** is Plaintiff Kevin Campbell's Training History.
4. Attached hereto as **Exhibit D** is Plaintiff Kevin Campbell's Offer Letter/Employment Agreement.
5. Attached hereto as **Exhibit E** is Plaintiff Kevin Campbell's Earnings.
6. Attached hereto as **Exhibit F** is James Cahill's Declaration.
7. Attached hereto as **Exhibit G** is Augusto Alzate's Station File Excerpt.
8. Attached hereto as **Exhibit H** is GFTP Correspondence and Rationale.
9. Attached hereto as **Exhibit I** are IEEO Documents.

10. Attached hereto as **Exhibit J** is Nan Malebranche File Excerpt.
11. Attached hereto as **Exhibit K** is Pl.'s Production Number 75 (Video).
12. Attached hereto as **Exhibit L** is Defendants' Response. to Plaintiff's Fifth Set of Interrogatories.
13. Attached hereto as **Exhibit M** is Peter Lorenzi's Investigation and Suspension.
14. Attached hereto as **Exhibit N** is FedEx's IEEO Policy

Respectfully submitted,

/s/ Gabriel P. McGaha  
Gabriel P. McGaha  
(seeking *pro hac vice* admission)  
Federal Express Corporation – Legal  
Litigation  
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(901) 434-3131 telephone  
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*Counsel for Defendants  
Federal Express Corporation and  
Eric Warnders*

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this 18th day of November 2024, the foregoing document was served via electronic mail to:

Jessica Massimi  
Massimi Law PLLC  
99 Wall Street, Suite 1264  
New York, NY 10005  
[jessica.massimi@gmail.com](mailto:jessica.massimi@gmail.com)

/s/ Gabriel P. McGaha  
Gabriel P. McGaha